

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

DONNA CURLING, *et al.*,

Plaintiffs,

v.

BRAD RAFFENSPERGER, *et al.*,

Defendants.

SEALED

CIVIL ACTION NO.
1:17-cv-2989-AT

ORDER

Before the Court is the Parties' Joint Statement Concerning Expert Disclosures [Doc. 1716] and the portion of Defendants' Omnibus Motion in Limine concerning disclosure of Dr. Halderman's methods and data [Doc. 1723, Section IV].

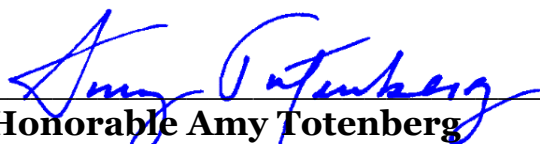
In connection with Defendants' request for access to the relevant data and programs¹ at issue, Defendants are **DIRECTED** to identify for the Court and the Curling Plaintiffs: the particular consulting expert who they propose would review the data and provide that expert's resume/CV and all affiliations; all attorneys and staff who Defendants believe would require access to the data; and any and all other individuals who they believe would require access to this data. Additionally, Defendants are **DIRECTED** to provide the Court and the Curling Plaintiffs with a specific protocol for the provision and inspection of this data, as well as a protocol

¹ The particular data and programs are outlined in Defendants' Notice to Produce, served on November 11, 2021 (Doc. 1716-1.)

for maintaining its security and nondisclosure to others. This protocol must be more particularized and tailored than the suggestion provided by Defendants to the Curling Plaintiffs in March of 2022. (See Doc. 1716-5.) Further, the Curling Plaintiffs are similarly **DIRECTED** to provide the Court and Defendants with a proposed protocol for the safe provision and/or inspection of this data.²

Defendants are **ORDERED** to provide a list (to the Court and Curling Plaintiffs) containing their consulting expert and all individuals they request be provided access to the data by **December 14, 2023 at 3:00 p.m.** The parties are further **ORDERED** to exchange their proposed protocols for the provision of this data, and provide such proposals to the Court, by **9:00 a.m. on Friday December 15, 2023 at the latest.** The parties should provide this information to the Court by emailing Mr. Martin.

IT IS SO ORDERED this 13th day of December, 2023.



Honorable Amy Totenberg
United States District Judge

² The Court understands that the Curling Plaintiffs vehemently object to the provision/inspection of this data and further believe that the time, burden, and expense that would be required to ensure the safe provision and/or inspection of the data make such efforts unfeasible at this stage of the proceedings.